IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: William Daniel Vaughn, Debtor Case No. 24-01785-JAW
CHAPTER 13

NOTICE

The above referenced debtor has filed papers with the court to allow payment arrearage.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to amortize the payments, or if you want the court to consider your views on the Motion, then on or before 30 days, you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk
U.S. Bankruptcy Court
Thad Cochran United States Courthouse
501 E. Court St., Ste 2.300
Jackson, MS 39201

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date state above.

You must also mail a copy to the debtors' attorney:

The Rollins Law Firm, PLLC P.O. Box 13767 Jackson, MS 39236 (601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief, which shall sustain this Motion to Allow Payment Arrearage.

Date: April 22, 2025 Signature: /s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469) Jennifer Ann Curry Calvillo (MSBN 104367)

The Rollins Law Firm, PLLC

P.O Box 13767 Jackson, MS 39236

IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: William Daniel Vaughn, Debtor

Case No. 24-01785-JAW

CHAPTER 13

MOTION TO ALLOW PAYMENT ARREARAGE

COMES NOW, Debtor, by and through counsel, and moves this Court to amortize their past due Chapter 13 plan payments, and in support thereof, would show the Court as follows:

- 1. Debtor filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code.
- 2. Debtor fell behind on his payments due to loss of employment. Debtor is now employed and can continue making plan payments.
- 3. Debtor is requesting this Honorable Court to amortize the past due plan payments over the life of the plan, including any ongoing mortgage payments being paid through the plan.
- 4. Debtor is requesting that their Chapter 13 plan payments be increased as necessary to compensate for the lost plan payments with ongoing payments to resume in May 2025.

WHEREFORE, Debtor prays for an Order granting the above requested relief and any additional relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MS Bar No. 103469)
Jennifer Ann Curry Calvillo (MS Bar No. 104367)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Notice and Motion to Allow Payment Arrearage was forwarded on April 22, 2025, to:

By Electronic CM/ECF Notice:

Chapter 13 Case Trustee

U.S. Trustee

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

11	24-01765-JAW DKL02 FIIEU 04/22/25 EIILEIEU 04/22/25 10.00.55 Page 4 01 7
1	
2	
3	
4	UNITED STATES BANKRUPTCY COURT
5	SOUTHERN DISTRICT OF MISSISSIPPI
6	IN RE: CASE NO: 24-01785 WILLIAM DANIEL VAUGHN DECLARATION OF MAILING
7	CERTIFICATE OF SERVICE
8	Chapter: 13
9	
10	
11	On 4/22/2025, I did cause a copy of the following documents, described below,
12	Notice and Motion to Suspend Plan Payments
13	
14	
15	
16	
17	
18	to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with
19	sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.
20	I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice. com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.
21	
22	Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been
23	served electronically with the documents described herein per the ECF/PACER system. DATED: 4/22/2025
24	<u>/s/ Thomas C. Rollins, Jr.</u> Thomas C. Rollins, Jr.
25	The Rollins Law Firm
26	702 West Pine St Hattiesburg, MS 39401
27	601 500 5533 trollins@therollinsfirm.com
28	

24-01785-JAW Dkt 62 Filed 04/22/25 Entered 04/22/25 16:06:35 Page 4 of 7

	24-01785-JAW Dkt 62 Filed 04/22/25 Entered 04/22/25 16:06:35 Page 5 of 7
1	
2	
3	UNITED STATES BANKRUPTCY COURT
4	SOUTHERN DISTRICT OF MISSISSIPPI
5	IN RE: CASE NO: 24-01785
6	WILLIAM DANIEL VAUGHN CERTIFICATE OF SERVICE
7	DECLARATION OF MAILING Chapter: 13
8	
9	
10	
11	On 4/22/2025, a copy of the following documents, described below,
12	Notice and Motion to Suspend Plan Payments
13	
14	
15	
16	
17	
18	
19	were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.
20	The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above
21	referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.
23	DATED: 4/22/2025
24	
25	Will the
26	Miles Wood BK Attorney Services, LLC
27	d/b/a certificateofservice.com, for Thomas C. Rollins, Jr.
28	The Rollins Law Firm 702 West Pine St
	Hattiesburg, MS 39401

24-01785-JAW Dkt 62 Filed 04/22/25 Entered 04/22/25 16:06:35 Page 6 of 7

USPS FIRST CLASS MAILING RECIPIENTS:
Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING NCRS ADDRESS DOWNLOAD CASE 24-01785 SOUTHERN DISTRICT OF MISSISSIPPI TUE APR 22 12-8-47 PST 2025 (P) PNC BANK RETAIL LENDING P O BOX 94982 CLEVELAND OH 44101-4982 US BANKRUPTCY COURT
THAD COCHRAN US COURTHOUSE
501 E COURT STREET
SUITE 2300
JACKSON MG 30201 5036

AEGIS SCIENCE CORPORAT PO BOX 645612 CINCINNATI OH 45264-5312 AMERICAN EXPRESS NATIONAL BANK CO BECKET AND LEE LLP PO BOX 3001 MALVERN PA 19355-0701 AMEX PO BOX 981540 EL PASO TX 79998-1540

CITI CARDBEST BUY PO BOX 790040 ST LOUIS MO 63179-0040 CITIBANK NA
CITIBANK NA
5800 S CORPORATE PL
SIOUX FALLS SD 57108-5027

CITIBANKTHE HOME DEPOT PO BOX 790040 ST LOUIS MO 63179-0040

DISCOVER BANK

PO BOX 3025 NEW ALBANY OH 43054-3025 EXCLUDE

(D) DISCOVER BANK PO BOX 3025 NEW ALBANY OH 43054-302 DISCOVER FINANCIAL ATTN BANKRUPTCY PO BOX 3025 NEW ALBANY OH 43054-3025

FRANCISCANS MISSIONARI PO BOX 677963 DALLAS TX 75267-7963 FREEDOMPLUS 1875 SOUTH GRANT ST STE 400 SAN MATEO CA 94402-2676 KATHRYN LACHOWSKYKHAN ESQ FOR PNC BANK NATIONAL ASSOCIATION WILSON ASSOCIATES 400 W CAPITOL AVE SUITE 1400 LITTLE ROCK AR 72201-3562

MARINER FINANCE LLC ATTN BANKRUPTCY 8211 TOWN CENTER DRIVE NOTTINGHAM MD 21236-5904 (P) MENDELSON LAW FIRM PO BOX 17235 MEMPHIS TN 38187-0235

NELNET PO BOX 82561 LINCOLN NE 68501-2561

EXCLUDE

(D) (P) PNC BANK RETAIL LENDING P O BOX 94982 PERFORMANCE THERAPY 921 W BEACON ST PHILADELPHIA MS 39350-3229 EXCLUDE
(D) (P) PNC BANK RETAIL LENDING

RESURGENT RECEIVABLES LLC RESURGENT CAPITAL SERVICES PO BOX 10587 GREENVILLE SC 29603-0587 RIVER OAKS HOSPITAL 1030 RIVER OAKS DR FLOWOOD MS 39232-9729 RIVER OAKS HOSPITAL LLC DBA MERIT HEALTH RI CO DAVID L MENDELSON ESQ MENDELSON LAW FIRM PO BOX 17235 MEMPHIS TN 38187-0235

ROCKET LOANS 1050 WOODWARD DETROIT MI 48226-3573 ST DOMINIC PAIN MAN 969 LAKELAND DR JACKSON MS 39216-4606 SYNCHRONY BANKAMAZON ATTN BANKRUPTCY PO BOX 965060 ORLANDO FL 32896-5060

24-01785-JAW Dkt 62 Filed 04/22/25 Entered 04/22/25 16:06:35 Page 7 of 7

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

EXCLUDE

US DEPARTMENT OF EDUCATION CO NELNET 121 S 13TH ST LINCOLN NE 68508-1904

UNITED STATES TRUSTEE
501 EAST COURT STREET
SUITE 6-430
JACKSON MS 39201-5022

(P)UPGRADE INC
2 N CENTRAL AVE
10TH FLOOR
PHOENIX AZ 85004-4422

MELISSA VAUGHN 107 EASTHAVEN CIR BRANDON MS 39042-2805 MELISSA VAUGHN 205 LAUREL OAK CV BRANDON MS 39047-7449 SXCLUDE

THOMAS CARL ROLLINS JR
THE ROLLINS LAW FIRM PLLC
PO BOX 13767
TACKSON MS 39236 3767

EXCLUDE

TORRI PARKER MARTIN CHAPTER 13
BANKRUPT

200 NORTH CONGRESS STREET STE 400 JACKSON MS 39201 1902

DEBTOR

WILLIAM DANIEL VAUGHN 107 EASTHAVEN CIR BRANDON MS 39042-2805